

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Rexon Industrial Corporation, Ltd.,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No.: 04-cv-30180 MAP
	)	
Porter-Cable Corporation,	)	
Delta International Machinery, Corp.,	)	
and Pentair, Inc.,	)	
	)	
Defendants.	)	
	)	
Black & Decker, Inc.,	)	
Black & Decker (U.S.), Inc.,	)	
Porter-Cable Corporation, and	)	
Delta International Machinery, Corp.	)	
	)	
Plaintiffs-in-Counterclaim,	)	
v.	)	
	)	
Rexon Industrial Corporation, Ltd.,	)	
Rexon USA, Corp.	)	
	)	
Defendants-in-Counterclaim.	)	
	)	

**UNOPPOSED MOTION TO EXTEND TIME FOR  
COUNTER-DEFENDANTS REXON INDUSTRIAL CORPORATION, LTD., AND  
REXON USA, CORP., TO RESPOND TO COUNTERCLAIMANTS' AMENDED  
COUNTERCLAIMS**

Counter-defendants, Rexon Industrial Corporation, Ltd., ("Rexon") and Rexon USA, Corp., ("Rexon USA"), hereby move the Court for an order extending the time for Rexon and Rexon USA to respond to the Amended Counterclaims until October 31, 2005.

The grounds for this motion are as follows:

1. Black & Decker Inc., Black & Decker (U.S.) Inc., Porter-Cable and Delta International Machinery (collectively the "Counterclaimants") filed amended counterclaims on September 22, 2005 (the "Amended Counterclaims");
2. Counter-defendants Rexon and Rexon USA have yet to file an answer to the Amended Counterclaims due to an inadvertent oversight and would now like to file an answer; and
3. Counterclaimants agree not to oppose this motion.

WHEREFORE, Rexon and Rexon USA request an order extending the time for Rexon and Rexon USA to respond to the Amended Counterclaims until October 31, 2005.

Respectfully submitted,

Rexon Industrial Corporation, Ltd. and  
Rexon USA Corp.

/J. Kevin Grogan/  
J. Kevin Grogan (BBO # 635089)  
Arthur F. Dionne (BBO # 125760)  
Donald J. MacDonald (BBO# 644582)  
Kevin H. Vanderleeden (BBO# 648361)  
Emily J. Kasperowski (BBO # 657493)  
McCORMICK, PAULDING & HUBER LLP  
1350 Main Street, 5th Floor  
Springfield, Massachusetts 01103  
Phone: (413) 736-5401  
Facsimile: (413) 733-4543

**Attorneys for Rexon  
Industrial Corporation, Ltd., and  
Rexon USA Corp.**

**Certificate of Service**

I hereby certify that a copy of UNOPPOSED MOTION TO EXTEND TIME FOR COUNTER-DEFENDANT REXON USA, CORP., TO RESPOND TO COUNTERCLAIMANTS' AMENDED COUNTERCLAIMS was filed electronically with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Dina M. Hayes  
Email: [hayes@nshn.com](mailto:hayes@nshn.com)  
NIRO, SCAVONE, HALLER & NIRO  
181 West Madison, Suite 4600  
Chicago, Illinois 60602-4515  
Phone: (312) 236-0733  
Facsimile: (312) 236-3137

C. Jeffrey Kinder (BBO# 563890)  
Email: [kinder@fierstpucci.com](mailto:kinder@fierstpucci.com)  
FIERST, PUCCI & KINDER LLP 64 Gothic Street, Suite 4  
Northampton, Massachusetts 01060  
Phone: (413) 584-8067  
Facsimile: (413) 585-0787

**Attorneys for Black & Decker Inc.,  
Black & Decker (U.S.) Inc., Porter-Cable  
Corporation and  
Delta International Machinery Corporation**

I certify that all parties in this case are represented by counsel who are CM/ECF participants.

/J. Kevin Grogan/  
J. Kevin Grogan

[5038-0044]